

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION

STUART POUND,	)	
	)	Civil Action No. 3:20-CV-02097-JMC
Plaintiffs,	)	
	)	
vs.	)	
	)	<b>DEFENDANT WILCOX MARKETING,</b>
WILCOX MARKETING, INC.,	)	<b>INC.'S WITNESS LIST</b>
	)	
Defendant.	)	
	)	
	)	
	)	

---

1. Defendant Wilcox Marketing, Inc. hereby identifies the following witnesses who Defendant may call during trial:

- a. Defendant expects the only witness it will call will be Glenn Brown. Mr. Brown was Defendant's employee involved in this accident. He was driving a passenger vehicle at the time of the collision. He is expected to testify regarding his limited recollection of the accident day, his injuries, his treatment, and related matters. His memory of the accident is limited as he sustained a concussion as a result of the collision as well as a number of other significant injuries. Mr. Brown may also testify regarding his driving record and work history.
- b. Defendant may also call Michael Scott Nichols to testify as to the accident and the employment of Glenn Brown.

2. Defendant Wilcox Marketing, Inc. hereby identifies the following witnesses who Plaintiff may call during trial:

- a. Stuart Pound: Defendant expects Mr. Pound will testify to his limited recollection of the accident, his alleged injuries and damages, and his history.

- b. Chelly Pound: Mrs. Pound is married to Plaintiff and is expected to testify regarding how the accident has affected Mr. Pound and as to his history;
- c. Deputy Shawn Mohandro (Lexington County Sheriff Department, Lexington, South Carolina): Deputy Mohandro witnessed the accident and is expected to testify regarding the same. If Plaintiff is allowed to introduce the dash cam video of the accident, Deputy Mohandro will likely discuss that as well. Deputy Mohandro will also discuss his interaction with Plaintiff at the accident scene.
- d. Dr. Peter A. Bailey (Lexington Family Medical Practice, Cayce, South Carolina): Defendant anticipates Plaintiff will call Dr. Bailey to testify regarding Plaintiff's treatment and injuries. The Court recently directed Plaintiff's counsel to state whether Dr. Bailey will be called live at trial or whether Plaintiff will attempt to introduce his deposition. (ECF 57).
- e. Glenn Brown: Defendant anticipates Plaintiff will likely call Mr. Brown during Plaintiff's case-in-chief.

MCANGUS GOUDELOCK & COURIE, L.L.C.

s/ Sterling G. Davies

Sterling G. Davies (Federal ID No. 6288)

Michael Trask (Federal ID No. 12894)

Post Office Box 12519

1320 Main Street, 10th Floor (29201)

Columbia, South Carolina 29211

(803) 779-2300

sdavies@mgclaw.com

michael.trask@mgclaw.com

ATTORNEYS FOR DEFENDANT WILCOX  
MARKETING, INC.

May 31, 2022